

"SPECTRUM POLICY TASK FORCE SEEKS PUBLIC COMMENT ON ISSUES RELATED TO COMMISSION'S SPECTRUM POLICIES"

Fleetwood Group Inc. is a manufacturer of wireless audience response and classroom instruction equipment. We have been diligent in seeking to comply with design and usage criteria specified by the FCC for over 30 years.

The commission has raised a number of issues in this docket that could potentially have serious negative implications for manufacturers and service providers. For companies like Fleetwood, that have products that function in various roles under Part 90 and Part 15, changing licensing practices can be catastrophic to product lines that have been marketed on for years without incident.

For example, we have products that operate low power transmitters (<70mW) under Part 90 that have been approved for Itinerant Nationwide usage for over 10 years. The recent changes that favor auctioned spectrum severely impact secondary users. Specific site licenses are not even practical in a usage model that consists of transmitters moved around the country literally from one day to the next. Obviously, this presents a problem for tracking and identifying interference but there are plenty of technical methods to manage this without handicapping manufacturers and users. These could include common transmit status bands where products occasionally transmit at random intervals with identification tags. These tags could include a phone number to call to locate the transmitter and test for interference. Other methods utilizing telephone networks would work as well. It seems that smart policy would support quick location and interference elimination when such conditions exist. Much of the policy now seems to focus on policy that often prevents usage that will almost never interfere with other systems. Encouraging more efficient band utilization solves many of the problems that this document seeks to address.

We understand that there are many conflicting requirements for band utilization and that sound policy is necessary that plans for future needs. We, however, advocate a very careful approach to redefining spectrum usage for existing well defined bands. The management of these bands should be viewed not as an auction scheme that generates revenue and favors new and often large businesses, but rather as a plan to benefit incumbent users and support growth.

Regarding unlicensed devices (Page 3, Paragraph 5), we would highly advocate a plan to expand the permissible operations, bands, usage, etc.

The commission has raised a number of important issues regarding band management, fair treatment of legacy devices, and growth potential. We support all efforts to make spectrum available for all, to protect public safety needs, and to streamline international coordination. We will be pleased to participate as these issues unfold.

Respectfully submitted,

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